

## **ALCOHOL AND DRUG POLICY**

March 20, 2013

### ***SCOPE AND PURPOSE***

Geocomp is committed to providing a safe work environment for its Employees and for those whose safety may be affected by its Employees. Geocomp recognizes that the use of Alcohol and Drugs can adversely impact a safe work environment. This Policy, Supporting Standards and Site Specific Standards are aimed at ensuring a safe work environment and outline specific responsibilities, requirements and expectations to adequately mitigate the workplace risks associated with Alcohol and Drugs.

The purpose of this Policy is to address and minimize the risks in the workplace associated with Alcohol and Drugs and to ensure that all Employees are Fit-for-Duty. This Policy outlines the expectations regarding Fitness for Duty, and the prohibitions against the use and possession of Alcohol and Drugs. This Policy is only one facet of an overall approach to risk mitigation and safety.

### ***GUIDANCE & STANDARDS***

This Policy applies to all Geocomp Employees.

In addition to the obligations set out in this Policy and Supporting Standards, all Employees must comply with any additional Site Specific Standards.

### **1. RESPONSIBILITIES**

a) Employees will perform their job safely and responsibly, and in all ways consistent with established Company practices. In addition, all Employees will:

- report Fit-for-Duty for all scheduled or unscheduled duty and remain Fit-for-Duty while on Company Business and Company Premises;
- read, understand and abide by this Policy and Supporting Standards, as well as their responsibilities under it;
- seek advice and follow appropriate treatment if they have a current or emerging problem, and follow recommended monitoring programs after attending treatment;
- co-operate with any work modification related to safety concerns;
- notify their Leader if they believe a co-worker, contract worker or visitor is not Fit-for-Duty on the job; and
- cooperate as required with an investigation into a violation of this Policy or Supporting Standards, including any request to participate in the testing program as and when required to do so under this Policy.

b) The Company is responsible for:

- ongoing leadership and supervision to ensure safe operations and effectiveness of the Program;
- determining and providing appropriate levels of training for Employees;
- guiding Employees who voluntarily seek assistance for a personal problem to appropriate resources (e.g., Health and Wellness, EAP and/or other local resources) while maintaining confidentiality in accordance with Section 10 of this Policy;

- making arrangements for an assessment through Health and Wellness if, in the course of any performance-related discussion, an Employee states they have a problem with Alcohol or Drugs;
- taking appropriate steps to investigate any possible violation of the requirements set out in this Policy and Supporting Standards; and
- implementing the requirements of this Policy and Supporting Standards.

## **2. DEFINITIONS**

For the purposes of this Policy capitalized terms herein shall have the following meaning:

**Affiliates** mean a corporation or partnership that is affiliated with Geocomp, and, for the purpose of this definition, a corporation or partnership is affiliated with Geocomp if Geocomp controls sufficient votes to elect a majority of the directors or if Geocomp owns more than a 50% interest in the partnership or acts as the sole general partner of the partnership.

**Alcohol** refers to beer, wine and distilled spirits, and includes the intoxicating agent found in medicines or other products.

**BAC** means blood alcohol concentration.

**Company or Geocomp** means Geocomp Corporation. and its Affiliates.

**Company Business** refers to all business activities undertaken by Employees in the course of the Company's operations regardless of where the activities are conducted.

**Company Premises** includes but is not restricted to all land, facilities, operation, equipment and worksites used for the purpose of performing Company Business. Worksites include any work location which Employees have been assigned including any offsite work location.

**Drug** means any substance, including Illicit Drugs and Medications, which has the potential to change or adversely affect the way a person thinks, feels or acts.

**Drug Paraphernalia** means any equipment, product or material intended or designed for use in manufacturing, compounding, converting, concealing, processing, preparing or introducing an Illicit Drug or Alcohol into the human body. This refers to any product or device that may be used to attempt to mask, tamper with or adulterate an Alcohol and Drug testing sample.

**Employee(s)** means all regular full time, part time, temporary, casual and seasonal employees on the Company payroll and, subject to the terms of any applicable agreement.

**Employee Assistance Program or EAP** means an employer-sponsored benefit that provides confidential, professional counseling and advisory service for Employees. The program provides access to professional services from psychologists, social workers, and addiction specialist.

**Equipment** includes all vehicles, machinery, equipment and aircraft which are owned, leased or otherwise controlled by the Company. This includes Company provided transportation.

**Failure to Test** includes the failure to report directly for a test, refusal to submit to a test, or refusal to agree to disclosure of a test result to the Company Program Coordinator. A failure to test will include inability to provide sufficient quantities of breath or urine fluid to be tested without a valid medical explanation acceptable to the Company.

**Fitness for Duty or Fit-for-Duty** means the ability to safely and acceptably perform assigned duties without any limitations due to the use or after effects of Alcohol or Drugs.

**Health and Wellness** means Geocomp's Safety Committee

**Illicit Drugs** means any controlled substance or drug, illegal to possess, cultivate or traffic pursuant to the Controlled Drugs and Substances Act, or any other applicable legislation or regulation. Illicit Drugs does not include a Medication.

**Leader(s)** refers to an Employee accountable for a particular work area or shift of Employees, including leaders, managers, directors and others in supervisory positions that are directly responsible for the performance of others.

**Medical Review Officer** means a properly qualified independent physician who validates Alcohol and Drug test results.

**Medication** means a Drug obtained (i) over-the-counter, or (ii) by the Employee through a doctor's prescription.

**Policy or Alcohol and Drug Policy** means this Alcohol and Drug policy.

**Program** means this Policy, Supporting Standards and any additional Site Specific Standards.

**Program Coordinator** means the Company Alcohol and Drug program coordinator.

**Safety-Sensitive Position** means a position in which Employees have a key or direct role in an operation where if actions or decisions are not carried out properly could result in:

- i. a serious incident affecting the health or safety of Employees, contractors, customers, the public, the environment; or
- ii. an inappropriate response or failure to respond to an emergency or operational situation.

Employees who are required to temporarily relieve in a Safety-Sensitive Position and Leaders who directly supervise the Safety-Sensitive Positions and who may perform the same duties or exercise the same responsibilities are deemed to hold Safety-Sensitive Positions.

**Specified Position** means an executive position that the Company designates as having significant and ongoing responsibilities for decisions or actions that are likely to affect the safe operations of the Company.

**Site Coordinator** means the Geocomp Alcohol and Drug site coordinator.

**Site Specific Standard** means those Standards described in Section 13 of this Policy.

**Substance Abuse Assessment** means an assessment conducted by a Substance Abuse Professional to determine whether an Employee has a substance dependence disorder.

**Substance Abuse Professional** means an individual with knowledge of and clinical experience in the diagnosis and treatment of Alcohol and Drug related issues.

**Supporting Standards** means those standards adopted in furtherance of this Policy including, without limitation, those standards listed at the end of this Policy and otherwise as may be adopted or amended from time to time.

### **3. REQUIREMENTS AND PROHIBITIONS**

The following are prohibited while on Company Business or at Company Premises:

- the use, possession, cultivation, manufacture, storage, distribution, offering or sale of Alcohol, Illicit Drugs or Drug Paraphernalia;
- the possession, storage or use of prescription Medications prescribed for another individual or the possession, storage or use of prescription Medications without being able to produce a legally, medically obtained prescription;
- the distribution, offering or sale of Medications;
- reporting to work or being at work while not Fit-for-Duty; and
- the consumption of Alcohol or Illicit Drugs or the consumption of any product containing Alcohol while on duty including during meals or breaks unless otherwise permitted in accordance with the Social and Business Hosting Standard.

Employees must comply with the following requirements:

- report Fit-for-Duty and remain Fit for Duty while at work;
- report for testing and participate in testing as required and promote the integrity of the testing process without tampering, adulterating or interfering with testing (e.g., masking agents, diluting);
- use Medications responsibly and seek appropriate guidance regarding Medications that may impact safe work performance. Medications of concern are those that inhibit or may inhibit an Employee's ability to perform their job safely. More detail is found in the Medication Standard;
- when designated "on call", Employees must remain Fit-for-Duty to respond to a call and be in compliance with this Policy and Supporting Standards;
- if an Employee is under the influence of Alcohol or Drugs and is contacted by the Company to perform unscheduled services, Employees must decline the work request without any adverse consequences to the Employee;
- Employees must advise a Leader if a person may not be Fit-for-Duty, may be under the influence of Alcohol or Drugs, or may otherwise be in violation of this Policy and Supporting Standards. Reports must be made as soon as possible;

- Subject always to an obligation to be Fit-for-Duty, an Employee must refrain from the use of Alcohol or Drugs (other than Medications used in accordance with the Medication Standard) after being involved in or observing an incident until the earlier of (i) the Employee has been tested, or (ii) the Employee has been advised by the Company that they will not be tested, or (iii) 32 hours have elapsed since the incident; and viii. Employees must, when requested, participate fully in any investigation under this Policy and Supporting Standards.

#### **4. PREVENTION, ASSISTANCE, REHABILITATION, AFTERCARE**

**Prevention:** This Policy and the Supporting Standards stress the importance of prevention and early identification of potential Alcohol or Drug abuse. The Company will provide ongoing education and make information available on health and safety issues associated with alcohol and drug use and abuse. Employees are encouraged to access assistance through EAP, Health and Wellness, their personal physician, the appropriate Leader or community service for help with any Alcohol or Drug use or abuse that has the potential to affect their safe work performance.

In addition, the normal process of job performance monitoring will continue to be emphasized. Where appropriate, Employees with performance problems may be reminded that they can access assistance through EAP, Health and Wellness, their personal physician, or appropriate community services.

**Request for Assistance:** The Company recognizes that Alcohol and Drug dependencies are treatable illnesses and that early intervention improves the probability of a lasting recovery. Anyone who suspects they have a substance dependency or emerging Alcohol or Drug problem is encouraged to seek immediate advice and to follow appropriate treatment.

Employees may request help with an Alcohol or Drug problem through their Leader or human resources advisor, Health and Wellness or EAP. If a request is made through a Leader, a human resources advisor or EAP, the Employee may subsequently be referred to Health and Wellness. In appropriate cases Health and Wellness may refer the Employee to a Substance Abuse Professional for a Substance Abuse Assessment. Employees will be supported through any recommended treatment and aftercare program consistent with the Substance Abuse Professional's recommendations and within the bounds of the Company benefit plan. The Substance Abuse Professional will assess if the Employee has an Alcohol or Drug dependency, make recommendations as appropriate regarding education and treatment, and recommend a return to work monitoring program including unannounced follow-up testing as appropriate.

Accessing assistance or declaring a problem does not eliminate the requirement for maintenance of safe and acceptable performance levels and, for greater certainty, compliance with this Policy and the Supporting Standards including, without limitation, the requirement to be Fit-for-Duty.

**Aftercare:** All Employees who complete primary treatment (e.g., residential or out-patient treatment) for Alcohol or Drug problems as a result of a performance-related referral or request for assistance as provided for in this Policy may be required to participate in an aftercare program when returning to work. They may be required to enter into a written agreement which will outline the conditions governing their return to work, and the consequences for failing to meet those conditions.

**Return to Work Restrictions:** As part of an Employee's return to work, where a medical professional, Substance Abuse Professional, EAP professional, other counseling professional or Health and Wellness advises that there may be a risk that would prevent an Employee from doing their job safely, a work



modification may, in appropriate cases, be issued. Employees may be assigned alternate duties if available and at the discretion of the Company.

## **5. INVESTIGATION**

The Company will investigate any violations or suspected violations of the Policy and Supporting Standards including but not limited to in the following situations:

**Unfit for Duty Situations:** In all situations when an Employee may be unfit to be on Company Premises or to perform their duties, the Employee will be escorted by a Leader to a private place, interviewed, and given an opportunity to explain why they do not appear Fit for Duty. The Employee will be given an opportunity to provide a reasonable explanation for their behavior or condition, and the Leader will take action appropriate to the situation.

If the explanation is not reasonable, and/or the Leader conducting the interview still believes the Employee is not Fit-for-Duty, the Leader may take any of the following actions:

- referral for medical attention if there are immediate medical concerns (e.g., a health center, local hospital or clinic); and/or
- referral for an Alcohol and Drug test if there is reasonable cause.

The Employee will be provided with transportation and escorted to the collection site or hospital/clinic depending on the circumstances, and then transported to their local place of residence or the care of another adult person. At no time is the Employee to operate Equipment until the matter has been resolved. The Employee may be temporarily removed from their duties or reassigned pending completion of any investigation.

**Suspected Presence of Alcohol, Drugs or Drug Paraphernalia:** The Company reserves the right to investigate any situation when there are reasonable grounds to believe that Alcohol, Drugs or Drug Paraphernalia are present on any Company Premises in violation of this Policy and Supporting Standards. Leaders are responsible for identifying situations where an investigation is justified based on a combination of indicators which could include behavior, odor, or presence of Alcohol, Drugs or Drug Paraphernalia. Leaders will be responsible for advising their manager of the situation, who, after consultation, will make the final decision as to whether and how to initiate an investigation.

## **6. TESTING**

**Alcohol and Drug Testing:** Further information on Alcohol and Drug testing is found in the Alcohol and Drug Testing Standard. All Employees are subject to the following Alcohol and Drug testing:

- post incident
- reasonable cause
- return to duty – post violation
- return to duty – post treatment
- certification (Employees in Safety-Sensitive Positions)

Additional forms of Alcohol and Drug testing may be required on a site-specific basis.

## **7. EQUIPMENT OPERATION**

**Loss of License/Impaired Driving Charge/Suspension:** If an Employee has been charged with an impaired driving-related offense or has received an administrative temporary license suspension as a result of impaired driving, then, prior to operating any Equipment, an Employee must advise their Leader accordingly. Impaired driving includes, but is not restricted to, testing over the legal BAC in that jurisdiction, driving while impaired, refusal to blow into a breath analyzer or refusal to provide a sample for

testing. This may result in not being able to operate Equipment until the suspension is complete and the Employee has no further restrictions on their driver's license.

## **8. SOCIAL SITUATIONS**

In the case of any Company social event, appropriate regard will be taken for the safety and well-being of the individuals present and the community. Subject to any site specific limitations, responsible Alcohol use may be permitted at Company sponsored social functions with appropriate prior approval. Alternative transportation arrangements will be made available when possible.

Consistent with the above, if Alcohol is made available to Company guests in the course of conducting Company Business (e.g., restaurant meetings), Employees are expected to use reasonable judgment and be responsible in hosting others, and remain in compliance with the Policy and Supporting Standards. Procedures for hosting events are set out in the Social and Business Hosting Standard.

## **9. CONSEQUENCES OF A POLICY VIOLATION**

**General Requirements:** Any violation of this Policy and Supporting Standards may result in discipline up to and including termination of employment. In all situations, an investigation will be conducted to verify that a Policy or Standard violation has occurred. The appropriate discipline in a particular case depends on the nature of the Policy or Standard violation and the circumstances surrounding the situation. The severity of the violation will warrant entering the discipline process at different levels. General violations of this Policy include:

- failure to comply with the Policy and Supporting Standards;
- a positive Alcohol or Drug test (refer to the Alcohol and Drug Testing Standard); or
- a Failure to Test.

**Referral for Assessment:** After any confirmed positive Alcohol and Drug test, an Employee may be referred by Health and Wellness to a Substance Abuse Professional for a Substance Abuse Assessment (refer to the Substance Abuse Assessment Standard). Failing to meet with the Substance Abuse Professional or attend a scheduled Substance Abuse Assessment is a violation of this Policy.

**Conditions for Continued Employment:** Should the Company determine that employment will be continued after a violation of the Policy or Supporting Standards, the Employee will be required to enter into an agreement governing their continued employment which may require any or all of the following actions, or any other condition appropriate to the situation:

- temporary removal from their position;
- adherence to any recommended treatment and aftercare program;
- successful completion of a return to work Alcohol and Drug test;
- ongoing unannounced follow-up Alcohol and Drug testing for the duration of their agreement;
- adherence to any ongoing rehabilitation conditions or requirements; and
- no further Policy or Standard violations during the monitoring period.

Failure to meet the requirements of the agreement will be grounds for discipline up to and including termination.

## **10. CONFIDENTIALITY**

Confidentiality will be maintained to the greatest extent possible and disclosure will be restricted to where it is necessary for related health and safety concerns. Only information relating to the level of functionality (e.g., Fitness for Duty and any restrictions that may apply) may be shared with Leaders and for the sole

purpose of determining Fitness for Duty, appropriate work accommodations, and/or work re-entry initiatives.

#### **11. SAFETY-SENSITIVE POSITIONS**

Because of the greater risk involved in performing certain functions, some positions may be designated as Safety-Sensitive Positions. Employees holding Safety-Sensitive Positions may be subject to additional requirements.

#### **12. REVIEW AND AMENDMENTS**

The Policy and Supporting Standards are subject to ongoing review and modifications as may be necessary from time to time.

#### **13. SITE SPECIFIC STANDARDS**

This Policy sets out requirements which may be enhanced or modified by any facility, site or business unit where justified. Any enhancements or modifications must be in the form of a site specific Supporting Standard that is supported by justification and brought forward for approval by the corporate vice president environment health & safety in consultation with the executive leader of the site, vice president or senior vice president as appropriate prior to implementation.

#### ***EXCEPTIONS***

Exceptions for Alcohol Possession: Subject to any site specific requirements unopened Alcohol containers may be stored locked in the trunk of personal vehicles parked outside secured areas at Company Premises provided such vehicles are not being used for Company Business.

#### ***REFERENCES TO RELATED DOCUMENTS***

*Alcohol and Drug Testing Standard*

*Medication Standard*

*Social and Business Hosting Standard*

*Substance Abuse Assessment Standard*